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July 28, 2023

**VIA ECF**

Hon. Lewis A. Kaplan, U.S.D.J.  
US Southern District Court of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: Gill v. Giuliani, et al., 1:23-cv-04087**

Dear Judge Kaplan:

I write on behalf of Defendant Giuliani in the above-referenced matter. I represent Mr. Giuliani in other matters, but my firm and I are unable to represent Mr. Giuliani in the present matter due to a business conflict. Notwithstanding the foregoing, I write, on behalf of Mr. Giuliani, to request that the time for him to respond to the complaint in this matter be extended from July 31, 2023 to August 21, 2023. The reason for this request is that Mr. Giuliani has been unable to locate counsel to handle this case, despite diligent efforts to do so. Several possible leads were ultimately unable to take on this matter. He has likely located two possible firms to represent him and they will be retained in the near future.

This is the first request for an extension of Mr. Giuliani's time to respond to the Complaint. Plaintiff's counsel does not take any position as to this request.

We thank you for your attention to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Adam S. Katz', is written over the typed name.

Adam S. Katz, Esq.

AK:sd

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